HUNTERS POINT NAVAL SHIPYARD BASE REALIGNMENT AND CLOSURE CLEANUP TEAM MEETING NOTES September 4, 2014

These notes summarize the meeting of the Navy Base Realignment and Closure (BRAC) Cleanup Team (BCT) for Hunters Point Naval Shipyard (HPNS). The meeting was held at 10:00 a.m. on September 4, 2014 via teleconference.

I. Introductions, Meeting Guidelines, Agenda Review, and Meeting Minutes

Melanie Kito (Navy) began with introductions; participants are listed on the last page of this summary. The action items from August were completed, with the exception of the proposed path forward for Area of Concern (AOC)-28J. Catherine Haran (Navy) noted that the Navy will likely provide an update on the situation at AOC-28J in October but will leave the item as an action item.

II. Radiological Program Update (Melanie Kito, Navy)

- Parcel C, Phase II Ship Berth Surveys includes Ship Berths 1 through 5. Ship Berths 3, 4, and 5 have been completed. Additional investigation at Ship Berths 1 and 2 (SUs 10 through 13) was required. The Navy has completed collection of additional measurements and swipes at SU 13. Collection of additional static measurements and swipe samples at biased sample locations is ongoing at SUs 10, 11, and 12.
- At Buildings 211 and 253 all of the Class 1 and Class 2gamma, alpha/beta, systematic samples and swipes, and biased samples and swipes are complete. Biased samples and swipes in Class 3 areas are 100 percent complete.
- In Parcel E for the I Street removal, the Navy has completed removal of 7,642 linear feet of the sanitary and storm drain systems. All 16 trench units are excavated. Of those, seven are currently being backfilled or undergoing site restoration and nine have been backfilled and restored. The Navy has begun installation of the replacement drainage swale along I Street and has recycled approximately 3,000 tons of asphalt.
- In Parcel D-1, Phase I, the Navy is awaiting unrestricted radiological release for the Gun Mole Pier following California Department of Public Health (CDPH) analysis of confirmation samples and confirmation surveys conducted on March 18. CDPH hopes that they can get the Gun Mole Pier wrapped up by the end of September.
- At Parcel D-1, Phase II, the Navy demobilized from the site on August 6, 2014 and are awaiting definitive 21-day ingrowth sampling results for the radiological screening yard (RSY).

III. Industrial Storm Water Monitoring Program (Mahbub Hussain, Navy)

• The Navy filed a Notice of Intent (NOI) to obtain coverage under the Industrial General Permit in 1995 due to the presence of industrial facilities and tenants on HPNS at the time.

When the Basewide Sanitary Sewer and Storm Drain Removal Action was about to commence, the Navy terminated most of these leases. Currently the Navy has no industrial tenants operating on the base. However, the Navy continues to comply with the General Permit for compliance with industrial activities. The Navy developed and implements a storm water pollution prevention plan (SWPPP) and best management practices (BMPs) in accordance with the general permit.

- The storm water program includes quarterly non-storm water discharge observations, monthly visual observations of storm water, and sampling during two storm events. The results are summarized in the annual report.
- Discharge monitoring locations under the permit include five at Parcel E-2 and one at Parcel B. Historic and current laboratory analysis of samples collected at the locations on Parcels E-2 and B did not have significant levels of pollutants in storm water runoff.
- Mr. Nathan King (Water Board) asked about a historical detection of polychlorinated biphenyls (PCBs) in a former sanitary drain from Parcel G and if PCBs were sampled at a corresponding outfall. The Navy will look for historical outfall PCB data and report back.
- The Navy is going to submit a Notice of Termination to the general permit, except perhaps at E-2. After transfer of Parcel E-2, the Navy may elect to continue conducting storm water monitoring and BMPs as part of the long-term operation and maintenance plan at the site.
- The Navy will continue to comply with substantive storm water BMPs at each parcel until the time of property transfer.

IV. In-Situ Stabilization (ISS) Pilot Study Sampling Plan (Danielle Janda, Navy)

- The Navy noted that semi-dynamic leaching (SDL) test results are the primary metric for evaluating the leachability of contaminants from the ISS pilot study. The SDL test measures the leaching of contaminants of concern (COCs) over time in order to determine the contaminant diffusion rates and predict future water quality. If COC concentrations in the leachate are less than the aquatic criteria, then diffusion modeling is not necessary. If COC concentrations in the leachate are greater than aquatic criteria, then diffusion modeling is conducted to predict future water quality.
- Diffusion rates could not be calculated for metals during the bench study because the analytical method detection limit for zinc was greater than the aquatic criteria. This was caused by ion concentrations in the synthetic groundwater. Additionally, the analytical method detection limit for PCBs was greater than the aquatic criteria due to the small volumes of water used in analysis resulting from broken sample bottles in transit.
- The Navy collected two types of samples: core samples and cylinder samples. Two SDL tests will be conducted on each type of sample. The column/cylinder volumes will be increased in order to increase the volume of leachate for analysis in order to lower the detection limit for PCBs. Additional diffusion modeling may be done to supplement the results.

• The variations to the ISS pilot study work plan include the three additional SDL tests on the ISS columns; additionally, the synthetic precipitation leaching procedure will be adjusted to reach lower detection limits.

V. Parcel C Explanation of Significant Differences (ESD) Response to Comments (Tony Konzen, Navy)

- In response to Water Board Comment #6 to expand the technical justification for why a tiered approach for ubiquitous metals is appropriate given the RGs already take into account levels of metals naturally occurring in the fill material, the Navy will revise Section 4.1.1 and added a paragraph to Section 3.0 to provide further clarification of the tiered approach and how metals with concentrations at 5x and 10x the RGs are still protective of human health.
- For Water Board Comment #9 to revise the text to provide the rationale for including PCBs in the tiered approach, the Navy noted that the BCT and Navy agreed to include both metals and PCBs in the tiered approach during three TRIAD meetings held in 2012 and 2013 due to the immobile nature of PCBs and that the durable cover would serve as a remedy to prevent exposure to humans and the environment as long as the risk assessment showed no risk to the construction worker.
- For Water Board Comment #13 which requests justification for removing this excavation area given the PAH exceedances, the Navy also discussed the residual polycyclic aromatic hydrocarbon (PAH) concentrations remaining at excavation area 24-3 with BCT members during the TRIAD meetings. A no action approach with regard to these PAHs at this location was agreed upon due to the associated risk and isolated extent. However, this area was subsequently excavated and that information will be added.
- For USEPA Comment #1 in regards to remedial goals changing, the Navy will revise Sections 1, 3 and 4 to clearly note that remedial goals are being revised based on the tiered approach and that the remedial action objectives are not changing.
- In response to USEPA Comment #3, the Navy will expand Sections 4.1.1 and 4.2.2 to further explain areas with hazard indexes greater than 1.

VI. Community Involvement Update (Melanie Kito, Navy)

- The Navy's August bus tour had a combined 69 community members attending, which was less than the June bus tour. All participants were contacted via email and phone prior to the bus tour and community members provided positive feedback on the bus tour.
- The Navy completed the Annual Update Fact Sheet, and will complete fact sheets on the Radiological Program and Quarterly Progress Update in August. In addition, the Navy will finalize the Community Involvement Plan following receipt of final BCT comments.
- Print materials distributed in August included the radiation fact sheet and annual fact sheet.

HPNS BCT Meeting September 4, 2014 Page 4 of 4

• In September, the Navy will distribute the quarterly progress report and the community involvement plan update.

VII. Action Items/Future Meetings (Catherine Haran, Navy)

New Action Items:

• The Navy will review historic storm water outfall data for PCBs and forward results to the BCT members for review.

Ongoing Action Items:

• The Navy will update the BCT members on the situation at AOC-28J in October.

Next Meetings:

• The October BCT meeting will be held on October 2, 2014 at CH2M HILL's office in Oakland, CA.

Meeting participants:

Saul Bloom, Arc Ecology*

Karla Brasaemle, TechLaw*

Amy Brownell, City of SF*

Jackie Lane, USEPA*

Lily Lee, USEPA*

Ryan Gebman, AMEC* Leslie Lundgren, CH2M HILL*

Catherine Haran, Navy* Ryan Miya, DTSC*

Mahbub Hussain, Navy* Shanti Montgomery, TTECI*

Danielle Janda, Navy* Reggie Paulding, Navy*

Hamide Kayaci, Navy* Dorinda Shipman, Langan*

Nathan King, Water Board* Matt Wright, CDPH*

^{*} Indicates attendee participated via telephone